

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

ANNAKUTTY JOSEPH

Plaintiff,

v.

TARGET STORES, INC.
a/k/a TARGET CORPORATION

Defendant.

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Case No.: _____

NOTICE OF REMOVAL

Defendant, Target Stores, Inc. (“Target”), by counsel, pursuant to 28 U.S.C. §§ 1332(a)(1), 1441, and 1446, hereby removes the action brought against it by Annakutty Joseph (“Joseph”) in the Circuit Court of Prince William County, styled Annakutty Joseph v. Target Stores, Inc. a/k/a Target Corporation. As grounds for removal, Defendant states the following:

PARTIES

1. On or about April 30, 2018, Joseph filed a Complaint against Target in the Circuit Court of Prince William County. A copy of the Complaint is attached as Exhibit A.
2. The Complaint was served on CT Corporation, the Registered Agent for Target Stores, Inc. on April 25, 2019.
3. On information and belief, Joseph is a citizen of the Commonwealth of Virginia.
4. At the time this action was commenced in the Circuit Court of Prince William County and at the time of the filing of this Notice of Removal, Target was and remains a Minnesota Corporation with its principal place of business in Minneapolis, MN.

JURISDICTION AND VENUE

5. Defendant Target Stores, Inc. are not citizens of Virginia and complete diversity exists. Pursuant to 28 U.S.C. §§ 1332 and 1441, this Court has subject matter jurisdiction over the action.

6. The amount in controversy, pursuant to Plaintiff's Complaint, exceeds \$75,000, exclusive of interests and costs.

7. The last day of the 30 day period to remove falls on Saturday, May 25, 2019. Therefore, this notice of removal is timely filed within 30 days' notice of the initial pleading under 28 U.S.C. § 1446(b) and FRCP 6(a)

8. The United States District Court for the Eastern District of Virginia, Alexandria Division, embraces the County of Prince William.

PROCESS AND PLEADINGS

9. A copy of the Complaint and Summons is attached as Exhibit A. No other process, pleadings, or orders have been served upon Target. A copy of Target's Answer and Grounds of Defense and Demurrer are attached as Exhibit B.

10. The Circuit Court of Prince William County has been notified of the removal of this action. (Exhibit C).

BRIEF IN SUPPORT

11. Target will not file a brief in support of its Notice of Removal. According to the United States District Court for the Eastern District of Virginia Local Rule 7(F), briefs are only required to support motions.

WHEREFORE, Target requests that this action be removed to this Court and that this Court assume subject matter jurisdiction.

TARGET STORES, INC.
By Counsel

/s/

John D. McGavin, VSB No. 21794

jmcgavin@bmhlaw.com

Anna G. Zick VSB No. 86057

azick@bmhlaw.com

BANCROFT, McGAVIN, HORVATH & JUDKINS, P.C.

9990 Fairfax Blvd. Suite 400

Fairfax, Virginia 22030

(703)385-1000 Telephone

(703)385-1555 Facsimile

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of May, 2019 a true and accurate copy of the foregoing Notice of Filing a Notice of Removal was sent via mail and email to:

Kevin M. Leach, Esq.

Virginia State Bar No. 75893

TURBITT, LEACH & CRUM, PLLC

8996 Burke Lake Rd.

Suite 304

Burke, VA 22015

(703) 323-7000

(703) 323-7224 (Facsimile)

kevinleach@tlc.law

John D. McGavin /s/

John D. McGavin, VSB No. 21794

jmcgavin@bmhlaw.com

BANCROFT, McGAVIN,

HORVATH & JUDKINS, P.C.

9990 Fairfax Blvd. Suite 400

Fairfax, Virginia 22030

(703)385-1000 Telephone

(703)385-1555 Facsimile

Counsel for Defendant